

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

FARDAD RAHIMI,
a/k/a "Freddy," and
VINCENT GHAREMANI,
a/k/a "Vince,"

Defendants.

SEALED INDICTMENT

15 Cr.

15 CRIM 793

COUNT ONE

(Narcotics Importation Conspiracy)

The Grand Jury charges:

1. From at least in or about November 2014 up to and including in or about November 2015, in the Southern District of New York and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district, FARDAD RAHIMI, a/k/a "Freddy," and VINCENT GHAREMANI, a/k/a "Vince," the defendants, who will be first brought to and arrested in the Southern District of New York, and whose point of entry into the United States will be the Southern District of New York, together with others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

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2. It was a part and object of the conspiracy that FARDAD RAHIMI, a/k/a "Freddy," and VINCENT GHAREMANI, a/k/a "Vince," the defendants, and others known and unknown, would and did distribute, and possess with intent to distribute, a controlled substance, to wit, five kilograms and more of a mixture and substance containing a detectable amount of cocaine, intending and knowing that such substance would be imported into the United States from a place outside thereof, in violation of Sections 812, 959(a), 960(a)(3), 960(b)(1)(B), and 963 of Title 21, United States Code.

(Title 21, United States Code, Sections 959(c), 963; Title 18, United States Code, Section 3238.)

COUNT TWO

(Narcotics Importation Attempt)

The Grand Jury further charges:

3. From at least in or about November 2014 up to and including in or about November 2015, in the Southern District of New York and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district, FARDAD RAHIMI, a/k/a "Freddy," and VINCENT GHAREMANI, a/k/a "Vince," the defendants, who will be first brought to and arrested in the Southern District of New York, and whose point of entry into the United States will be the Southern District of New York, intentionally and knowingly did attempt to manufacture

or distribute a controlled substance, intending and knowing that such substance would be imported into the United States from a place outside thereof, in violation of Sections 959(a) and 963 of Title 21, United States Code.

4. The controlled substance involved in the offense was five kilograms and more of a mixture and substance containing a detectable amount of cocaine, in violation of Sections 812, 960(a)(3) & (b)(1)(B) of Title 21, United States Code.

(Title 21, United States Code, Sections 959(c), 963; Title 18, United States Code, Section 3238.)

FORFEITURE ALLEGATION

5. As a result of committing the controlled substance offenses alleged in Counts One and Two this Indictment, FARDAD RAHIMI, a/k/a "Freddy," and VINCENT GHAHREMANI, a/k/a "Vince," the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 853 and 970, any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts One and Two of this Indictment.

Substitute Assets Provision

6. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants -

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Sections 853(p) and 970, to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 853 and 970.)



FOREPERSON


PREET BHARARA *mr*
United States Attorney

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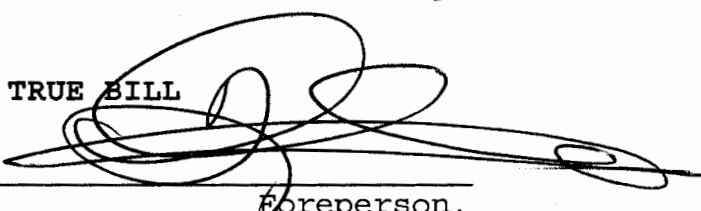
15 Cr.

(21 U.S.C. § 963.)

PREET BHARARA

United States Attorney.

A TRUE BILL



Foreperson.

Nov. 16-15

Filed Sealed Indictment. U.S.M.S. Henry B. Pitman